

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

PART 2

v.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S APPENDIX OF
DOCUMENTS IN SUPPORT OF HIS REVISED OMNIBUS MOTION IN LIMINE**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") files this Appendix of Documents
in support of his revised Omnibus Motion in Limine:

No.	Date	Document
1	1/5/11	Epstein's Motion to Amend Complaint (D.E. 195)
2	4/9/09	Plaintiff's Motion to Strike References to Non-Prosecution Agreement or, in the Alternative, to Lift Protective Order Barring Jane Doe's Attorneys from Revealing Provisions in the Agreement (D.E. 32); <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
3	4/17/09	Plaintiff's First Amended Complaint (D.E. 38) <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
4	4/30/09	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 148, 151-152); <i>E.W. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028058-XXXX-MB

No.	Date	Document
5	6/19/09	Plaintiff's Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein, and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 165); <i>Jane Doe 2 v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 08-cv-80119-MARRA/JOHNSON
6	11/5/09	Order Denying Plaintiff's Motion for Injunction, etc. (D.E. 400) <i>Jane Doe 2 v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 08-cv-80119-MARRA/JOHNSON
7	7/22/09	Letters from Edwards re depositions
8	7/27/09	Complaint (D.E. 1) <i>L.M. v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-81092-KAM
9	N/A	Court Docket <i>L.M. v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-81092-KAM
10	8/11/09 8/24/09	Re-Notices of Taking Videotaped Deposition of Donald Trump <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
11	8/10/09	Plaintiff's Request for Entry Upon Land (D.E. 143) <i>E.W. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028058-XXXX-MB
12	8/24/09	Epstein's Motion for Protective Order Regarding Depositions of Lawrence Visoski and David Hart Rogers (D.E. 159) <i>L.M. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028051-XXXX-MB
13	11/3/09	Article: <u>South Florida Sun-Sentinel</u> - <i>Scott Rothstein's investment deals seemed too good to be true</i>
14	11/6/09	Article: <u>New Times Broward-Palm Beach</u> – <i>Scott Rothstein: The Jeffrey Epstein and Bill Clinton Ploy</i>
15	11/9/09	Verified Complaint for Forfeiture <i>In Rem</i> (D.E. 1) <i>United States of America v. Scott W. Rothstein</i> (Forfeiture Action); S.D. Fla. Case No. 0:09-CV-61780-WJZ
16	11/12/09	Article: <u>South Florida Sun-Sentinel</u> – <i>FBI doubts Rothstein ran a Ponzi scheme alone</i>

No.	Date	Document
17	11/20/09	Complaint (without exhibits) (D.E. 3) <i>Razorback Funding, LLC v. Rothstein</i> 17th Jud. Cir. Case No. 062009CA062943AXXXCE
18	11/23/09	Amended Verified Complaint for Forfeiture <i>In Rem</i> (D.E. 14) <i>United States of America v. Scott W. Rothstein</i> (Forfeiture Action); S.D. Fla. Case No. 0:09-CV-61780-WJZ
19	11/23/09	Article: <u>South Florida Sun-Sentinel</u> – <i>You’re in a town full of thieves</i>
20	11/24/09	Article: <u>The Miami Herald</u> – <i>Feds: Scott Rothstein Ponzi scheme paid salaries at law firm</i>
21	11/25/09	Amended Complaint (without exhibits) (D.E. 12) <i>Razorback Funding, LLC v. Rothstein</i> 17th Jud. Cir. Case No. 062009CA062943AXXXCE
22	12/1/09	Information (D.E. 1) <i>United States v. Rothstein</i> ; S.D. Fla. Case No. 0:09-cr-60331-JIC
23	12/7/09	Complaint (without exhibits) (D.E. 5)
24	6/30/17	Affidavit of Jeffrey Epstein (D.E. 931)
25	11/10/17	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 163-164, 166, 227-229, 259-260, 276-278, 321-322, 338-339)
26	3/23/10	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 112, 116-117, 123-125, 230-231)
27	10/10/13	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 205)
28	7/26/09 8/13/09 10/23/09	Email from Pricilla Nascimento to Scott Rothstein Email from Bradley J. Edwards to Priscilla Nascimento Email from Ken Jenne to Scott Rothstein
29	6/14/12	Scott Rothstein’s Deposition Transcript Excerpts (pp. 23-26, 52-53)

No.	Date	Document
30	12/12/11	Scott Rothstein's Deposition Transcript Excerpts (pp. 59-62); <i>Razorback Funding, LLC v. Rothstein</i> ; 17th Jud. Cir. Case No. 062009CA062943AXXXCE
31	12/21/11	Scott Rothstein's Deposition Transcript Excerpts (p. 2278) <i>Razorback Funding, LLC v. Rothstein</i> ; 17th Jud. Cir. Case No. 062009CA062943AXXXCE
32	3/17/10	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 13-14, 19-20, 23, 25-26, 28-34, 36-39, 48-55, 57, 59-60, 62-69, 73-74, 76-80, 83-88, 90-95, 116-123)
33	11/9/17	Edwards' Amended Exhibit List (D.E. 1043)
34	11/15/17	Epstein's Objections to Edwards' Amended Exhibit List (D.E. 1058)
35	11/9/17	Edwards' Seventh Amended and Supplemental Witness List (D.E. 1042)
36	1/25/12	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 19-21)

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 21, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 301
West Palm Beach, Florida 33401
(561) 727-3600; (561) 727-3601 [fax]

By: /s/ Scott J. Link

Scott J. Link (FBN 602991)
Kara Berard Rockenbach (FBN 44903)
Angela M. Many (FBN 26680)
Primary: Scott@linkrocklaw.com
Primary: Kara@linkrocklaw.com
Primary: Angela@linkrocklaw.com
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Secondary: Troy@linkrocklaw.com
Secondary: Tanya@linkrocklaw.com
Secondary: Eservice@linkrocklaw.com

Trial Counsel for Plaintiff/Counter-Defendant
Jeffrey Epstein

SERVICE LIST

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---	--

Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 brad@epllc.com staff.efile@pathtojustice.com <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i>	Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 marc@nuriklaw.com <i>Counsel for Defendant Scott Rothstein</i>
Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>	

APP. 9

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**U.S. District Court
Southern District of Florida (West Palm Beach)
CIVIL DOCKET FOR CASE #: 9:09-cv-81092-KAM**

L.M. v. Espstein

Assigned to: Judge Kenneth A. Marra

Demand: \$1,000,000

Cause: 28:1391 Personal Injury

Date Filed: 07/24/2009

Date Terminated: 07/20/2010

Jury Demand: Plaintiff

Nature of Suit: 360 P.I.: Other

Jurisdiction: Federal Question

Plaintiff

L.M.

represented by **Bradley James Edwards**
Farmer Jaffe Weissing Edwards
Fistos & Lehrman PL
425 N Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301
954-524-2820
Fax: 954-524-2822
Email: brad@pathtojustice.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

Jeffrey Epstein

represented by **Michael James Pike**
Pike & Lustig, LLP
2465 Mercer Avenue
Suite 204
West Palm Beach, FL 33401-2918
561-512-6537
Email: pike@bigfirmalternative.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Robert Deweese Critton , Jr.
Critton Luttier & Coleman
303 Banyan Boulevard
Suite 400
West Palm Beach, FL 33401-2918
561-842-2820
Fax: 561-253-0164
Email: rcrit@lawclc.com

LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Material Witness

Jean Luc Bruhnel

Date Filed	#	Docket Text
07/24/2009	<u>1</u>	COMPLAINT AND DEMAND FOR JURY TRIAL against Jeffrey <u>Espstein</u> . Filing fee \$ 350.00 Receipt#: 546977, filed by L.M. (Attachments: # <u>1</u> part 2 of complaint, # <u>2</u> part 3 of complaint)(vt) (Entered: 07/27/2009)
07/24/2009	<u>2</u>	MOTION to Keep True Name in Sealed Envelope. (vt) (Entered: 07/27/2009)
07/24/2009	<u>3</u>	MOTION To Proceed Anonymously by L.M. (vt) (Entered: 07/27/2009)
07/29/2009	<u>4</u>	ORDER TRANSFERRING CASE to Judge Kenneth A. Marra for all further proceedings, accepted and signed on 7/29/09. Judge James I. Cohn no longer assigned to case. Signed by Judge James I. Cohn on 7/28/2009. (ail) (Entered: 07/30/2009)
07/30/2009	<u>5</u>	Order Requiring Counsel to Confer and File Joint Scheduling Report. Signed by Judge Kenneth A. Marra on 7/30/2009. (ir) (Entered: 07/30/2009)
08/11/2009	6	Hereinafter, this case shall be consolidated with the related Epstein cases (08-80119) for purposes of discovery and for procedural motions relating to multiple cases. This is a paperless order.. Signed by Judge Kenneth A. Marra on 8/11/2009. (mkz) (Entered: 08/11/2009)
08/19/2009	7	Clerks Notice to Filer re (274 in 9:08-cv-80119-KAM) Notice (Other). Docket text does not match document; ERROR - The Filer failed to enter a title in the docket text that matches the title of the document. The correction was made by the Clerk. It is not necessary to refile the document. Associated Cases: 9:08-cv-80119-KAM et al.(tp) (Entered: 08/19/2009)
11/09/2009	<u>8</u>	Third Party MOTION for Protective Order <i>and Incorporated Memorandum of Law</i> by Igor Zinoviev. Associated Cases: 9:08-cv-80119-KAM et al.(Goldberger, Jack) (Entered: 11/09/2009)
11/16/2009	<u>9</u>	REPLY to Response to Motion re (405 in 9:08-cv-80119-KAM) MOTION Order for the preservation of evidence (<i>Reply to Response of Rothstein Rosenfeldt Adler P.A.'s</i>) filed by Jeffrey Epstein. Associated Cases: 9:08-cv-80119-KAM et al.(Pike, Michael) (Entered: 11/16/2009)

APP. 10

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80893CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Re-NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Donald-Trump on, August 18, 2009, at 11:00 a.m., at:

**Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119**

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail and email transmission this 11th day of **August, 2009** to all those on the attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

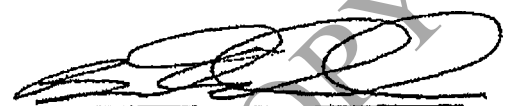
401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reports

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Service List

09-22785

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Jack Alan Goldberger, Esq.,
Atterbury Goldberger et al.,
250 Australian Ave. South,
Suite 1400,
West Palm Beach, FL 33401.

09-22785

Paul G. Cassell, Esq.
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Jack Alan Goldberger, Esq.
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
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West Palm Beach, FL33401-5012

8/24

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80893CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Re-NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Donald Trump on, September 24, 2009, at 11:00 a.m., at:

Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail and email transmission this 24 day of August, 2009 to all those on the attached Service List.

101

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By:



BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reports

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APP. 11

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IN THE CIRCUIT COURT FOR THE
FIFTEENTH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

FILE NO. 502008CP003626XXXXMB

502008CA028058

AB

E.W.,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

09 AUG 12 PM 3:23

SHARON R. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL/PROBATE

PLAINTIFF'S REQUEST FOR ENTRY UPON LAND

Comes Now Plaintiff, EW, by and through undersigned counsel and pursuant to
1.350(a)(3) Fla.R.Civ.P., and requests the following:

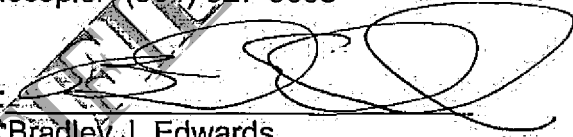
1. To enter Defendant Jeffrey Epstein's property located at 358 El Brillo Way, West Palm Beach, FL 33480.
2. Inspect the entire property located at that location, including but not limited to the driveway, the interior of the house, each and every room in the house, the massage table, the backyard, the swimming area and all other areas located on said property.
3. To take video and/or photographs of the property and inspection.

According to the Palm Beach County Property Appraiser, this property is approximately 14,223, exclusive of the outside area, and thus it is anticipated that the inspection will take approximately 4 hours. In addition to the undersigned, the inspection will be attended by other lawyers with the law firm of Rothstein Rosenfeldt Adler, a videographer and members of the video team, a photographer and members of the photography team and other persons to assist in the process. These people attending the inspection are available for the inspection to take place on **Friday, August 28, 2009** to begin at the property at **10:00 a.m.** The undersigned will work with Defendant to agree on a mutually acceptable time and date above is not convenient for Defendant.

WHEREFORE, the Plaintiff respectfully requests that this Court enter an Order granting it's Request for Entry Upon Land requiring the Defendant, Epstein, to schedule such entry on Friday, August 28, 2009 at 10:00 a.m., or in the alternative, no later than twenty days following entry of the Court's Order granting same.

I HEREBY CERTIFY that a copy of the foregoing was served by mail this 10th day of August, 2009 to: Robert D. Critton, Jr., Esq., Burman, Critton, et al., 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401.

ROTHSTEIN ROSENFELDT ADLER
Attorneys for Plaintiff
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33394
Telephone (954) 522-3456
Telecopier (954) 527-8663

By: 

Bradley J. Edwards
Florida Bar No. 542075
bedwards@rra-law.com
William J. Berger
Florida Bar No. 197701
wberger@rra-law.com

APP. 12

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IN THE COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FLORIDA

L.M.,

CASE NO. 502008CA028051XXXXMB AB

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**EPSTEIN'S MOTION FOR PROTECTIVE ORDER REGARDING
DEPOSITIONS OF LAWRENCE VISOSKI AND DAVID HART ROGERS**

Defendant, JEFFREY EPSTEIN ("Epstein"), pursuant to Fla. R. Civ. P. 1.280(c), moves for a protective order regarding the depositions of Lawrence Visoski and David Hart Rogers, and states:

1. On August 24, 2009, Plaintiff, L.M., noticed the depositions of Lawrence Paul Visoski, Jr. and David Hart Rogers. See Notices of Deposition attached as Exhibits A & B.¹
2. The subpoenas duces tecum attached to the deposition notices request:

All original flight logs from January, 1998 through present for any and all aircraft/airplanes/jets which you piloted or co-piloted that were owned or controlled by Jeffrey Epstein or Ghislaine Maxwell.
3. The foregoing document request is overbroad, not relevant or reasonably calculated to lead to the discovery of admissible evidence.
4. The conduct alleged by LM is limited to the time frame: "[b]eginning in approximately August 2002 and continuing until approximately September 2005." See Second Am. Compl.
5. LM does not allege that any tortious conduct occurred before August 2002 or after September 2005. Ergo, there is no conceivable relevance of flight logs outside this time period.

¹ The deposition of Mr. Visoski was renoticed for October 15, 2009 and the deposition of Mr. Rogers was renoticed for October 13, 2009. See Re-Notices of Taking Deposition attached as Exhibits C & D, respectively.

6. Accordingly, the Court should enter a protective order limiting the time period for the flight logs requested in the subpoenas duces tecum to the August 2002 through September 2005.

WHEREFORE, Defendant, JEFFREY EPSTEIN, respectfully requests the Court enter a protective order limiting the subpoenas duces tecum to Lawrence Visoski and David Hart Rogers to the time period August 2002 through September 2005 and grant any further relief the Court deems just and proper.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this 13th day of October, 2009:

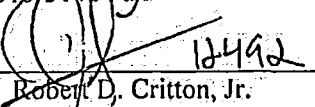
Brad Edwards, Esq. (*also via hand delivery*)
Rothstein Rosenfeldt Adler
401 East Las Olas Boulevard
Suite 1650
Fort Lauderdale, FL 33301
954-522-3456 Phone
954-527-8663 Fax
Counsel for Plaintiff

Jay Howell, Esq.
Jay Howell & Associates, P.A.
644 Cesery Boulevard
Suite 250
Jacksonville, FL 32211
904-680-1234 Phone
904-680-1238 Fax
Co-counsel for Plaintiff

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
Fax: 561-835-8691
Co-Counsel for Defendant Jeffrey Epstein

BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
303 Banyan Blvd., Suite 400
West Palm Beach, FL 33401
(561) 842-2820
(561) 515-5148 Fax

By: _____


Robert D. Critton, Jr.
Florida Bar #224162
for Michael J. Pike
Florida Bar #617296

(Counsel for Defendant Jeffrey Epstein)

8/27
P

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 502008CA028051XXXXMB AD

NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that the attorney for Plaintiff in the above-styled cause will take the deposition of LAWRENCE PAUL VISOSKI JR on October 8, 2009 at 10:00 a.m. for the purposes of discovery at the following location:

Esquire Court Reporters
515 N Flagler Dr
West Palm Beach, FL 33401-4321

Said deposition will be taken before ESQUIRE COURT REPORTERS, a Notary Public or any officer authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor employee, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action.

Said deposition will be taken pursuant to Florida Rules of Civil Procedure in such cases provided. Said oral examination will continue from hour to hour and from day to day until completed.

EXHIBIT A

ce-JE125

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail and Facsimile this 24 day of August, 2009 to: Michael Burman, Esq., & Robert D. Critton, Jr., Esq., Burman, Critton, et al., 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401; Jay Howell, Esq., Jay Howell & Assoc., 644 Gesery Boulevard, Suite 250, Jacksonville, FL 32211; and Jack Alan Goldberger, Esq., Atterbury Goldberger et al., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401.

ROTHSTEIN ROSENFELDT ADLER
Attorneys for Plaintiff
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33394
Telephone (954) 522-3456
Telecopier (954) 527-8663

By: 

Bradley J. Edwards
Florida Bar No. 542075
bedwards@rra-law.com
William J. Berger
Florida Bar No. 197701
wberger@rra-law.com

copies Furnished to: Esquire Court Reporters

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 502008CA028051XXXXMB

SUBPOENA DUCES TECUM
FOR VIDEOTAPED DEPOSITION

THE STATE OF FLORIDA:

TO: LAWRENCE PAUL VISOSKI JR
1131 PINE POINT RD,
WEST PALM BEACH FL 33404

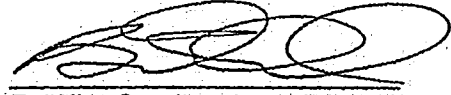
YOU ARE COMMANDED to appear before a person authorized by law to take depositions on October 8, 2009 at 10:00 a.m., at Esquire Court Reporters, 515 North Flagler Drive, West Palm Beach, FL 33401 for the taking of your deposition in this action and to have with you at that time and place the following:

All original flight logs from January, 1998 through present for any and all aircraft/airplanes/jets which you piloted or co-piloted that were owned or controlled by Jeffrey Epstein or Ghislaine Maxwell.

If you fail to appear, you may be in contempt of court. You are subpoenaed to appear by the following attorneys and unless excused from this Subpoena by these attorneys or the Court you shall respond to this Subpoena as directed.

DATED on August 24, 2009.

Bradley J. Edwards



For The Court

Rothstein Rosenfeldt Adler
401 East Las Olas Blvd
Suite 1650
Fort Lauderdale, Florida 33301
Florida Bar No.: 542075
(954) 522-3456

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IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

8/2/09

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 502008CA028051XXXXMB AD

NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that the attorney for Plaintiff in the above-styled cause will take the deposition of **DAVID HART ROGERS** on **October 7, 2009** at **10:00 a.m. p.m.** for the purposes of discovery at the following location:

Esquire Court Reporters
515 N Flagler Dr
West Palm Beach, FL 33401-4321

Said deposition will be taken before **ESQUIRE COURT REPORTERS**, a Notary Public or any officer authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor employee, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action.

Said deposition will be taken pursuant to Florida Rules of Civil Procedure in such cases provided. Said oral examination will continue from hour to hour and from day to day until completed.

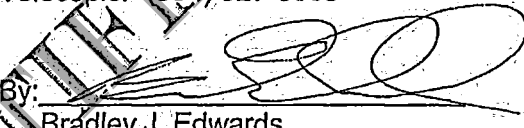
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cc-JE, BT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail and Facsimile this 24 day of August, 2009 to: Michael Burman, Esq., & Robert D. Critton, Jr., Esq., Burman, Critton, et al., 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401; Jay Howell, Esq., Jay Howell & Assoc., 644 Gesery Boulevard, Suite 250, Jacksonville, FL 32211; and Jack Alan Goldberger, Esq., Atterbury Goldberger et al., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401.

ROTHSTEIN ROSENFELDT ADLER
Attorneys for Plaintiff
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33394
Telephone (954) 522-3456
Telecopier (954) 527-8663

By: 
Bradley J. Edwards
Florida Bar No. 542075
bedwards@rra-law.com
William J. Berger
Florida Bar No. 197701
wberger@rra-law.com

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IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 502008CA028051XXXXMB

SUBPOENA DUCES TECUM
FOR VIDEOTAPED DEPOSITION

THE STATE OF FLORIDA:

TO: David Hart Rogers
13136 54TH ST N,
ROYAL PALM BEACH FL

YOU ARE COMMANDED to appear before a person authorized by law to take depositions on October 7, 2009 at 10:00 a.m., at Esquire Court Reporters, 515 North Flagler Drive, West Palm Beach, FL 33401 for the taking of your deposition in this action and to have with you at that time and place the following:

All original flight logs from January, 1998 through present for any and all aircraft/airplanes/jets which you piloted or co-piloted that were owned or controlled by Jeffrey Epstein or Ghislaine Maxwell.

If you fail to appear, you may be in contempt of court. You are subpoenaed to appear by the following attorneys and unless excused from this Subpoena by these attorneys or the Court you shall respond to this Subpoena as directed.

DATED on August 24, 2009.

Bradley J. Edwards



For The Court

Rothstein Rosenfeldt Adler
401 East Las Olas Blvd
Suite 1650
Fort Lauderdale, Florida 33301
Florida Bar No.: 542075
(954) 522-3456

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IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 502008CA028051XXXXMB AD

Re-NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that the attorney for Plaintiff in the above-styled cause will take the deposition of Larry Visoski on October 15, 2009 at 10:00 a.m. for the purposes of discovery at the following location:

Esquire Court Reporters
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West Palm Beach, FL 33401-4321

Said deposition will be taken before ESQUIRE COURT REPORTERS, a Notary Public or any officer authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor employee, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action.

Said deposition will be taken pursuant to Florida Rules of Civil Procedure in such cases provided. Said oral examination will continue from hour to hour and from day to day until completed.

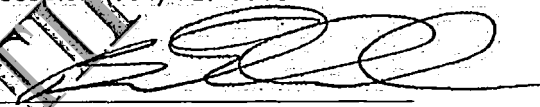
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Case No. 502008CA028051XXXXMB AD

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail and Email Transmittal, this 22 day of October, 2009 to: Michael Burman, Esq., & Robert D. Critton, Jr., Esq., Burman, Critton, et al., 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401; Jay Howell, Esq., Jay Howell & Assoc., 644 Gesery Boulevard, Suite 250, Jacksonville, FL 32211; and Jack Alan Goldberger, Esq., Atterbury Goldberger et al., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401.

ROTHSTEIN ROSENFELDT ADLER
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bedwards@rra-law.com
William J. Berger
Florida Bar No. 197701
wberger@rra-law.com

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IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 502008CA028051XXXXMB AD

Re-NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that the attorney for Plaintiff in the above-styled cause will take the deposition of DAVID HART ROGERS on October 13, 2009 at 10:00 a.m. for the purposes of discovery at the following location:

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Said deposition will be taken before ESQUIRE COURT REPORTERS, a Notary Public or any officer authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor employee, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action.

Said deposition will be taken pursuant to Florida Rules of Civil Procedure in such cases provided. Said oral examination will continue from hour-to-hour and from day-to-day until completed.

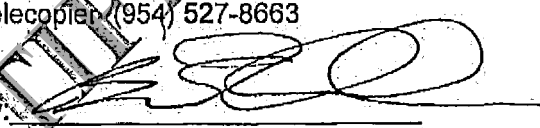
EXHIBIT D

Case No. 502008CA028051XXXXMB AD

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail and Email Transmittal, this 9th day of October, 2009 to: Michael Burman, Esq., & Robert D. Critton, Jr., Esq., **Burman, Critton, et al.**, 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401; Jay Howell, Esq., **Jay Howell & Assoc.**, 644. Gesery Boulevard, Suite 250, Jacksonville, FL 32211; and Jack Alan Goldberger, Esq., **Atterbury Goldberger et al.**, 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401.

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William J. Berger
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APP. 13

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PERSONAL INJURY LAW... IT'S ALL WE DO!



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Scott Rothstein's investment deals seemed too good to be true

Many wondered how he did it

now they're finding out

November 3, 2009 | By Sally Kestin, Jon Burstein and Brittany Wallman, South Florida Sun-Sentinel

For years, Broward County's socially and politically connected marveled at the astonishing success of Fort Lauderdale lawyer Scott Rothstein and wondered: How does he do it?

Answers may have begun to emerge Monday, even as the law firm Rothstein built and the image he cultivated as an altruistic philanthropist crumbled.

According to a lawsuit filed against him by his firm and its co-founding partner, Rothstein was running a covert investment scheme on the side and may have walked away with "substantial sums" entrusted to him by investors.

The scope of the investment business is not known, but the Fort Lauderdale securities litigation firm Sonni & Erez said Monday it is investigating claims that Rothstein "may be involved in a \$100 million investment that imploded."

Rothstein attracted investors by promising huge returns and selling settlements he said he'd reached in sex discrimination and whistle-blower cases, documents he gave prospective clients show.

But according to the lawsuit filed against him, at least some of those settlements did not exist, and investors say money they invested with Rothstein is now missing.

Rothstein was believed to be out of the country Monday, but his attorney said he intends to return to South Florida and "straighten this thing out."

Alan Sakowitz, a Miami lawyer and developer, told the Sun Sentinel he had met with Rothstein as a potential investor three times, but quickly became suspicious.

"I was convinced it was all a Ponzi scheme and I notified the FBI in detail how Scotty was hiding behind a legitimate law firm to peddle fake settlements," Sakowitz said.

An FBI spokeswoman declined to comment. A spokesman for Banyan Income Fund, an investment group that collected \$85 million and invested an undisclosed amount with Rothstein, said it contacted federal prosecutors in recent days with concerns about "suspicious activity."

Rothstein's "allegedly improper activities were done without any knowledge of the other attorneys at the firm," the lawsuit by Rothstein's firm asserts.

At the law firm's headquarters in downtown Fort Lauderdale, Rothstein used an office with a private entrance. Stuart Rosenfeldt, his co-founding partner, told the Sun Sentinel several of their co-workers may have done work for the investment business without realizing its scope or nature.

Rothstein's uncle also worked at the firm. Rosenfeldt said he also vanished in recent days.

Over the years, Rosenfeldt said, Rothstein lied to him, but he added, "The kinds of small lies I caught him in were nothing to lead you to conclude your partner was running a giant scam out of your law firm."

Rothstein's confidential offerings obtained by the Sun Sentinel describe extremely high-paying but largely unregulated investment opportunities.

One from August offered investors a 36 percent return in three months, far more than the troubled stock and bond markets.

Those documents say that Rothstein's firm sought out sexual discrimination and whistle-blower cases and used former cops to dig up incriminating evidence.

Sakowitz, the potential investor, said Rothstein boasted of having sophisticated eavesdropping equipment and that former cops would sift through potential defendants' garbage.

With compromising evidence in hand, the firm urged the targets of the claims to pay a settlement without a public lawsuit.

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"These types of cases are highly confidential and thus, quite lucrative, because the defendants place a high premium on keeping the details of the case confidential," one investment offering said.

Rothstein claimed to have a "huge volume of cases, an employer sleeping with the secretary or receptionist," Sakowitz said.

Once a settlement was reached, the defendant typically preferred to stretch the payments out over time. Rothstein offered his clients a way to avoid waiting for the money by giving them a lesser amount, but in a lump sum up front, Sakowitz said.

Investors funded the payments to clients and would receive the full settlement amount in three to 12 months, with a guaranteed minimum 20 percent return, according to the investment offering.

In a \$4 million settlement, an investor would make \$1 million in seven months.

Sakowitz said Rothstein offered him a \$240,000 profit in three months, an offer he considered too good to be true.

"It was virtually no risk," Sakowitz said. "These were so filled with red flags we just couldn't get our hands around it being legitimate."

He said Rothstein told him he'd been doing such investment deals for seven years.

Mark F. Raymond, managing partner of Broad and Cassel law firm in Miami, said he persuaded at least one client not to invest.

"Every time I heard about them I just said, 'No way,'" Raymond said.

A distraught Rosenfeldt said Monday he feared that Rothstein had destroyed the firm's reputation.

"I think we're going to go down in history in the same breath as [Bernie] Madoff," he said.

Staff Writers Peter Franceschina and Harriet Brackey contributed to this report. Sally Kestlin can be reached at skestlin@sunsentinel.com or 954-356-4510.

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APP. 14

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Scott Rothstein: The Jeffrey Epstein and Bill Clinton Ploy

By Bob Norman

published: Fri., Nov. 6 2009 @ 10:17AM

A key question regarding Scott Rothstein's fraudulent scheme that until now has gone largely unanswered: How did he lure so many rich and powerful locals to pour tens of millions into the estimated billion-dollar Ponzi that imploded last weekend?



Epstein was bait.

One way he did it was by tricking investors into believing that his firm was representing numerous underaged girls who had sex with Palm Beach billionaire and convicted child sex offender Jeffrey Epstein, sources have confirmed. On top of that, Rothstein claimed that he had flight logs showing that Epstein flew extremely prominent people, including former President Bill Clinton, on his private jet with some of the plaintiffs.

He told investors that Epstein, Clinton, and other celebrities involved basically had no choice but to settle these cases and that it was a veritable treasure-trove. They then ponied up millions to invest in the settlements, pay out a portion of those settlements to the victims, and pocket the rest.

Problem: Rothstein, who is currently in talks with federal officials after returning from his run to Morocco, was fabricating the story. He took a shred of the truth -- there were some civil suits filed against Epstein, including at least one handled by the Rothstein Rosenfeldt and Adler firm -- and built it into a grandiose lie that promised hundreds of millions of dollars in returns for his investors. There apparently is no indication that the former president, who was at one time a real friend of Epstein's, and other celebrity names bandied about by Rothstein were

involved in any way. Of course, his investors didn't know this. The settlements were supposedly confidential, so they had to take Rothstein's word for it. Adding to the secrecy -- and Rothstein's cover -- was the fact that many of the actual plaintiffs in the Epstein case were underaged girls known only by initials.

Even his claims about celebrities flying on Epstein's jet has a seed in truth. It was well-known that in 2002, he flew Clinton, Kevin Spacey, and Chris Tucker to Africa on an anti-AIDS mission in his private Boeing 727.

I learned about Rothstein's use of the Epstein angle from a source close to the case and contacted Fort Lauderdale attorney Bill Scherer, who is representing multiple Rothstein investors. He confirmed that the Epstein play had been used by Rothstein.

"He used the [Epstein case] as a showpiece, as bait," said Scherer. "That's the way he raised all the money. He would use legitimate cases as bait for luring investors into fictional cases. All the cases he allegedly structured were fictional. I don't believe there was a real one in there."

At least one legitimate case involving Epstein and an underaged girl -- initials E.W. -- were being handled by Rothstein Rosenfeldt Adler lawyer William Berger, a former Palm Beach County Circuit Judge. Sources say they believe Berger wasn't involved in Rothstein's scam. Efforts to reach the former judge weren't successful.



Rothstein

One source close to the case said there were numerous other ploys, though this one appears to have been one of Rothstein's more profitable creations.

"Think of the legitimate Epstein civil case as a car on the road," said the source. "Then think of that car driving off the road onto heavy terrain and kicking into four-wheel drive. That's what happened here, and Rothstein was at the wheel."

Known investors and feeder funds include venture capitalist Doug Von Allmen, prominent car dealer Ted Morse, socialite art dealer Bonnie Barnett, and the Banyon Fund, which involved Fort Lauderdale businessman George Levin. There are many others who contributed to what Scherer now estimates was a billion-dollar Ponzi scheme.

Rothstein's fraudulent empire came crashing down last weekend, sending his 70-lawyer firm into a tailspin and receivership almost literally overnight. Rothstein fled to Morocco before returning Tuesday on a G5. He is now said to be in extensive talks with federal officials in hopes of cutting a plea deal.

Epstein was hit with scandal more than two years ago when it was discovered he was having sex with underaged girls in his Palm Beach mansion. He was charged by state authorities in 2006 and entered a plea deal last year. Since, he has been hounded by civil suits.



Showing 57 comments

APP. 15

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **09-CV-61780-Zloch-Rosenbaum**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VARIOUS REAL PROPERTIES PURCHASED BY
OR WITH OR ON BEHALF OF SCOTT W. ROTHSTEIN,
SPECIFICALLY:

(1) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2307 CASTILLA ISLE, FORT
LAUDERDALE, FLORIDA;

(2) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2308 CASTILLA ISLE, FORT
LAUDERDALE, FLORIDA;

(3) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2316 CASTILLA ISLE,
FORT LAUDERDALE, FLORIDA;

(4) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 30 ISLA BAHIA DRIVE,
FORT LAUDERDALE, FLORIDA;

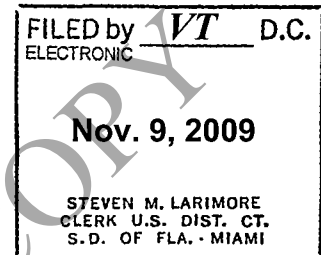
(5) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 29 ISLA BAHIA DRIVE,
FORT LAUDERDALE, FLORIDA;

(6) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 350 SE 2nd STREET, UNIT 2840,
FORT LAUDERDALE, FLORIDA;

(7) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 380 CARRINGTON DRIVE,
WESTON, FLORIDA;

(8) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2133 IMPERIAL POINT DRIVE,
FORT LAUDERDALE, FLORIDA;

Defendants.



VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

Plaintiff, United States of America, hereby files this verified civil complaint for forfeiture *in rem* and states as follows:

GENERAL ALLEGATIONS

1. This is a civil action for forfeiture *in rem* for eight real properties, situated in Broward County in the Southern District of Florida, and appurtenances thereon, located at (1) 2307 Castilla Isle, Fort Lauderdale, Florida; (2) 2308 Castilla Isle, Fort Lauderdale, Florida; (3) 2316 Castilla Isle, Fort Lauderdale, Florida; (4) 30 Isla Bahia Drive, Fort Lauderdale, Florida; (5) 29 Isla Bahia Drive, Fort Lauderdale; (6) 350 SE 2nd Street, Unit 2840, Fort Lauderdale, Florida; (7) 380 Carrington Drive, Weston, Florida; and (8) 2133 Imperial Point Drive, Fort Lauderdale, Florida, hereinafter collectively known as "the defendants" or "the defendant properties," for violation of 18 U.S.C. §1343, and/or 18 U.S.C. §1957, thereby subjecting the defendant properties to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and pursuant to 18 U.S.C. §981(a)(1)(A).

2. This Court has jurisdiction over this action under 28 U.S.C. §§ 1331, 1345 and 1355.

3. Venue is proper in the Southern District of Florida pursuant to 28 U.S.C. §§ 1355 (b)(1), 1355 (b)(2) and 1395 because the defendant properties are located in the Southern District of Florida.

4. The defendant real properties will not be seized, but will be posted with a summons/notice of the complaint in accordance with 18 U.S.C. §985(c)(1) and (3).

5. The defendant real property located at 2307 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 1," includes all buildings, improvements, fixtures,

attachments and easements found therein or thereon, and is more particularly described as:

Lauderdale Shores Reamen Plat 15-31 B Lot 2 Blk 5

6. The defendant real property located at 2308 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 2," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Lauderdale Shores Reamen Plat 15-31 B Lot 2 Blk 4

7. The defendant real property located at 2316 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 3," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Lauderdale Shores Reamen Plat 15-31 B Lot 3 & Lot 4 W ½ Blk 4

8. The defendant real property located at 30 Isla Bahia Drive, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 4," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Isla Bahia 47-27 B Lot 63

9. The defendant real property located at 29 Isla Bahia Drive, Fort Lauderdale, hereafter also referred to as "Defendant 5," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Isla Bahia 47-27 B Lot 35

10. The defendant real property located at 350 SE 2nd Street, Unit 2840, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 6," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

350 Las Olas Place Condo Unit 2840

11. The defendant real property located at 380 Carrington Drive, Weston, Florida, hereafter also referred to as "Defendant 7," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Sector 4 North 153-46 B Lot 24 Blk A

12. The defendant real property located at 2133 Imperial Point Drive, Fort Lauderdale, hereafter also referred to as "Defendant 8," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Imperial Point 1 Sec 53-44 B Lot 11 Blk 22

FACTUAL ALLEGATIONS

13. Based upon the following information, there is probable cause to believe that the above-described defendant properties were acquired in connection with a "Ponzi" scheme, conducted by attorney Scott Rothstein, hereinafter "ROTHSTEIN," and others. ROTHSTEIN has been operating the "Ponzi" scheme since approximately 2005.

14. According to witness complaints, clients were solicited by, or on behalf of, ROTHSTEIN to invest in pools of structured settlements in which putative plaintiffs in civil cases had entered into confidential settlement agreements with putative defendants based upon the forbearance of civil claims in sexual harassment and other labor-related cases. The potential investors were told that these settlements, which existed in blocks ranging from hundreds of thousands to millions of dollars, could be purchased at a discount and repaid to the investors at face value over time. Clients who agreed to invest were directed by ROTHSTEIN or others to wire transfer funds to the trust account of Rothstein, Rosenfeld and Adler, PA, hereinafter "RRA," a law firm located in Fort Lauderdale, Florida. For example, in September 2009, one potential investor

was told that he could purchase a settlement valued at \$450,000.00 for \$375,000.00 which would be repaid in increments of \$150,000.00 per month for the following three months. This would amount to a yield of 20 percent over three months, or an annual percentage yield in excess of 80 percent. The investor was further told that the funds were held in the RRA trust account. The investor was shown a purported wire transfer receipt as evidence that the funds were held in the trust account of RRA. ROTHSTEIN is the first named partner of RRA.

15. The criminal investigation has disclosed that the investments purportedly underlying the above-described investment scheme never existed. The investigation has established that no such settlement agreements had ever existed and the entire investment scheme was a fraud. These transactions constituted a "Ponzi" scheme in which new investor money was utilized to pay previous investors in furtherance of the scheme. The investigation has disclosed that these types of fraudulent investments had been offered by Rothstein to a variety of persons and entities throughout the United States for at least four years, and the scheme involved hundreds of millions of dollars. Multiple bank accounts were utilized at financial institutions into which investors' money was sent by wire transfer across state lines. Further, as a fraudulent inducement to investors, ROTHSTEIN and co-conspirators falsified documents which were presented to investors as proof that certain sums of money were contained in these bank accounts when, in fact, the bank accounts did not contain these funds.

16. The investigation has established that portions of the criminally derived proceeds were used to pay past investors thereby promoting the scheme. The investigation has established that portions of the criminally derived proceeds were used to acquire millions of dollars worth of assets including the defendant real properties set forth above. The investigation has further established that

many of the properties have been transferred to the following nominee corporations controlled by Rothstein, as set forth below, as a wealth preservation mechanism: "C1 07 LLC," "C1 08 LLC," "C1 16 LLC," "29 Bahia LLC," "MLC 350 LLC," "350 LOP #2840 LLC," "JB Boca M Holdings LLC."

17. The investigation has established that Rothstein's financial ability to acquire such properties did not exist prior to the execution of the Ponzi scheme.

18. Rothstein used proceeds obtained from the Ponzi scheme to acquire the defendant real properties.

19. Rothstein acquired Defendant 1 on or about September 21, 2007 for a sales price of \$1,750,000.

20. Defendant 1 was transferred, via Quit Claim Deed, to "C1 07 LLC" on or about August 10, 2009.

21. Rothstein acquired Defendant 2 on or about March 3, 2005 for a sales price of \$2,730,000.

22. Defendant 2 was transferred, via Quit Claim Deed, to "C1 08 LLC" on or about July 22, 2009.

23. Rothstein acquired Defendant 3 on or about March 14, 2007 for a sales price of \$1,925,000.

24. Defendant 3 was transferred, via Quit Claim Deed, to "C1 16 LLC" on or about August 10, 2009.

25. Rothstein and his wife Kimberly Rothstein acquired Defendant 4 on or about March 14, 2008 for a sales price of \$6,450,000.

26. Defendant 5, a vacant lot, was transferred to "29 Bahia LLC" on or about January 7,

2009, for a sales price of \$4,000,000.

27. Defendant 6 was acquired by "MLC350 LLC" on or about May 31, 2005.

28. Defendant 6 was transferred, via Warranty Deed, to "350 LOP #2840 LLC" on or about May 20, 2009.

29. Rothstein acquired Defendant 7 on or about April 8, 2008 for a sales price of \$475,000.

30. Defendant 7 was transferred to Debra E. Villegas on or about July 27, 2009 for \$100.

31. Rothstein acquired Defendant 8 on or about November 5, 2008 for a sales price of \$505,000.

32. Defendant 8 was transferred to 2133 IP LLC on or about August 10, 2009 via quit claim deed for \$100.

FIRST CLAIM FOR FORFEITURE
18 U.S.C. §§ 981(a)(1)(C) and 1343

33. Plaintiff realleges paragraphs 5 through 32, above as if fully set forth herein.

34. Title 18, United States Code, Section 981(a)(1)(C) subjects to forfeiture: "[a]ny property, real or personal, which constitutes or is derived from proceeds traceable to ... any offense constituting 'specified unlawful activity' (as defined in section 1956(c)(7) of this title, or a conspiracy to commit such offense."

35. "Specified unlawful activity" is defined in 18 U.S.C. §1956(c)(7), and the term includes any offense under 18 U.S.C. §1961(1). Section 1961(1) lists 18 U.S.C. 1343 (wire fraud) as an offense.

36. Title 18, United States Code, Section 1343 provides that:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits, or causes to be transmitted by means of wire, radio or television communication in interstate or foreign commerce, any writings, signs, signals, pictures or sounds for the purpose of executing such scheme or artifice, shall be fined...

37. Ponzi scheme investors utilized interstate wires to transfer their funds to Rothstein and or RRA.

38. The millions of dollars generated by the Ponzi scheme constitute proceeds of wire fraud.

39. Rothstein used the proceeds of wire fraud to acquire the defendant properties.

40. Based on the foregoing, the defendant properties constitute or were derived from proceeds traceable to the specified unlawful activity of wire fraud, in violation of Title 18, United States Code, Section 1343, and are thereby forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(c).

SECOND CLAIM FOR FORFEITURE
18 U.S.C. §§ 981(a)(1)(A) and 1957

41. Plaintiff realleges paragraphs 5 through 32 above as if fully set forth herein.

42. Title 18, United States Code, Section 981(a)(1)(A) subjects to forfeiture "[a]ny property, real or personal, involved in a transaction or attempted transaction in violation of ... section 1957...of this title, or any property traceable to such property."

43. Title 18, United States Code, Section 1957 provides in pertinent part:

(a) Whoever, in any of the circumstances set forth in subsection (d), knowingly engages or attempts to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from specified unlawful activity, shall be punished as provided in subsection (b).

(d) The circumstances referred to in subsection (a) are –

(1) that the offense under this section takes place in the United States or in the special maritime and territorial jurisdiction of the United States...

44. “Monetary transaction” is defined in 18 U.S.C. §1957(f)(1) as the:

deposit, withdrawal, transfer, or exchange, in or affecting interstate or foreign commerce, of funds or a monetary instrument ... by, through, or to a financial institution (as defined in section 1956 of this title), including any transaction that would be a financial transaction under section 1956(c)(4)(B) of this title...

45. “Financial transaction” is defined in 18 U.S.C. §1956(c)(4) as:

(A) a transaction which in any way or degree affects interstate or foreign commerce (i) involving the movement of funds by wire or other means or (ii) involving one or more monetary instruments, or (iii) involving the transfer of title to any real property, vehicle, vessel or aircraft, or (B) a transaction involving the use of a financial institution which is engaged in, or the activities of which affect, interstate or foreign commerce in any way or degree.

46. “Criminally derived property” is defined in 18 U.S.C. §1957(f)(2) as “any property constituting, or derived from, proceeds obtained from a criminal offense.”

47. “Specified unlawful activity” is defined in 18 U.S.C. §1956(c)(7), and the term includes any offense under 18 U.S.C. §1961(1). Section 1961(1) lists 18 U.S.C. 1343 (wire fraud) as an offense.

48. Because the funds used to acquire the defendant properties, constitute criminally derived property from wire fraud, exceed \$10,000 and were involved in a monetary transaction, the defendants are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) as they represent properties involved in a transaction or attempted transaction in violation of 18 U.S.C. §1957, and properties traceable to such property.

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CONCLUSION

WHEREFORE, Plaintiff, United States of America requests, that any and all persons having any claim to the defendant properties be directed to file and serve their verified claims and answers as required by Rule G(5), of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, or suffer default thereof, and further requests that the Court declare the defendant properties condemned and forfeited to the United States of America, and that Plaintiff have such other and further relief as may be just and proper together with the costs and disbursements of this action.

Respectfully submitted,

JEFFREY H. SLOMAN
ACTING UNITED STATES ATTORNEY

By: _____

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VERIFICATION

Pursuant to Title 28, United States Code, Section 1746, I declare under penalty of perjury, that I have read the foregoing Complaint for Forfeiture In Rem and state that the facts alleged therein are true and correct to the best of my knowledge and belief.

Executed this _____ day of November, 2009.

TARYN GUARIGLIA, Special Agent
INTERNAL REVENUE SERVICE

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

VARIOUS REAL PROPERTIES PURCHASED BY
OR WITH OR ON BEHALF OF SCOTT W. ROTHSTEIN,
SPECIFICALLY:

(1) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2307 CASTILLA ISLE, FORT
LAUDERDALE, FLORIDA;

(2) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2308 CASTILLA ISLE, FORT
LAUDERDALE, FLORIDA;

(3) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2316 CASTILLA ISLE,
FORT LAUDERDALE, FLORIDA;

(4) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 30 ISLA BAHIA DRIVE,
FORT LAUDERDALE, FLORIDA;

(5) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 29 ISLA BAHIA DRIVE,
FORT LAUDERDALE, FLORIDA;

(6) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 350 SE 2nd STREET, UNIT 2840,
FORT LAUDERDALE, FLORIDA;

(7) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 380 CARRINGTON DRIVE,
WESTON, FLORIDA;

(8) REAL PROPERTY AND APPURTENANCES,
LOCATED AT 2133 IMPERIAL POINT DRIVE,
FORT LAUDERDALE, FLORIDA;

Defendants.

_____ /

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

Plaintiff, United States of America, hereby files this verified civil complaint for forfeiture *in rem* and states as follows:

GENERAL ALLEGATIONS

1. This is a civil action for forfeiture *in rem* for eight real properties, situated in Broward County in the Southern District of Florida, and appurtenances thereon, located at (1) 2307 Castilla Isle, Fort Lauderdale, Florida; (2) 2308 Castilla Isle, Fort Lauderdale, Florida; (3) 2316 Castilla Isle, Fort Lauderdale, Florida; (4) 30 Isla Bahia Drive, Fort Lauderdale, Florida; (5) 29 Isla Bahia Drive, Fort Lauderdale; (6) 350 SE 2nd Street, Unit 2840, Fort Lauderdale, Florida; (7) 380 Carrington Drive, Weston, Florida; and (8) 2133 Imperial Point Drive, Fort Lauderdale, Florida, hereinafter collectively known as "the defendants" or "the defendant properties," for violation of 18 U.S.C. §1343, and/or 18 U.S.C. §1957, thereby subjecting the defendant properties to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and pursuant to 18 U.S.C. §981(a)(1)(A).

2. This Court has jurisdiction over this action under 28 U.S.C. §§ 1331, 1345 and 1355.

3. Venue is proper in the Southern District of Florida pursuant to 28 U.S.C. §§ 1355 (b)(1), 1355 (b)(2) and 1395 because the defendant properties are located in the Southern District of Florida.

4. The defendant real properties will not be seized, but will be posted with a summons/notice of the complaint in accordance with 18 U.S.C. §985(c)(1) and (3).

5. The defendant real property located at 2307 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 1," includes all buildings, improvements, fixtures,

attachments and easements found therein or thereon, and is more particularly described as:

Lauderdale Shores Reamen Plat 15-31 B Lot 2 Blk 5

6. The defendant real property located at 2308 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 2," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Lauderdale Shores Reamen Plat 15-31 B Lot 2 Blk 4

7. The defendant real property located at 2316 Castilla Isle, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 3," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Lauderdale Shores Reamen Plat 15-31 B Lot 3 & Lot 4 W ½ Blk 4

8. The defendant real property located at 30 Isla Bahia Drive, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 4," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Isla Bahia 47-27 B Lot 63

9. The defendant real property located at 29 Isla Bahia Drive, Fort Lauderdale, hereafter also referred to as "Defendant 5," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Isla Bahia 47-27 B Lot 35

10. The defendant real property located at 350 SE 2nd Street, Unit 2840, Fort Lauderdale, Florida, hereafter also referred to as "Defendant 6," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

350 Las Olas Place Condo Unit 2840

11. The defendant real property located at 380 Carrington Drive, Weston, Florida, hereafter also referred to as "Defendant 7," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Sector 4 North 153-46 B Lot 24 Blk A

12. The defendant real property located at 2133 Imperial Point Drive, Fort Lauderdale, hereafter also referred to as "Defendant 8," includes all buildings, improvements, fixtures, attachments and easements found therein or thereon, and is more particularly described as:

Imperial Point 1 Sec 53-44 B Lot 11 Blk 22

FACTUAL ALLEGATIONS

13. Based upon the following information, there is probable cause to believe that the above-described defendant properties were acquired in connection with a "Ponzi" scheme, conducted by attorney Scott Rothstein, hereinafter "ROTHSTEIN," and others. ROTHSTEIN has been operating the "Ponzi" scheme since approximately 2005.

14. According to witness complaints, clients were solicited by, or on behalf of, ROTHSTEIN to invest in pools of structured settlements in which putative plaintiffs in civil cases had entered into confidential settlement agreements with putative defendants based upon the forbearance of civil claims in sexual harassment and other labor-related cases. The potential investors were told that these settlements, which existed in blocks ranging from hundreds of thousands to millions of dollars, could be purchased at a discount and repaid to the investors at face value over time. Clients who agreed to invest were directed by ROTHSTEIN or others to wire transfer funds to the trust account of Rothstein, Rosenfeld and Adler, PA, hereinafter "RRA," a law firm located in Fort Lauderdale, Florida. For example, in September 2009, one potential investor

was told that he could purchase a settlement valued at \$450,000.00 for \$375,000.00 which would be repaid in increments of \$150,000.00 per month for the following three months. This would amount to a yield of 20 percent over three months, or an annual percentage yield in excess of 80 percent. The investor was further told that the funds were held in the RRA trust account. The investor was shown a purported wire transfer receipt as evidence that the funds were held in the trust account of RRA. ROTHSTEIN is the first named partner of RRA.

15. The criminal investigation has disclosed that the investments purportedly underlying the above-described investment scheme never existed. The investigation has established that no such settlement agreements had ever existed and the entire investment scheme was a fraud. These transactions constituted a "Ponzi" scheme in which new investor money was utilized to pay previous investors in furtherance of the scheme. The investigation has disclosed that these types of fraudulent investments had been offered by Rothstein to a variety of persons and entities throughout the United States for at least four years, and the scheme involved hundreds of millions of dollars. Multiple bank accounts were utilized at financial institutions into which investors' money was sent by wire transfer across state lines. Further, as a fraudulent inducement to investors, ROTHSTEIN and co-conspirators falsified documents which were presented to investors as proof that certain sums of money were contained in these bank accounts when, in fact, the bank accounts did not contain these funds.

16. The investigation has established that portions of the criminally derived proceeds were used to pay past investors thereby promoting the scheme. The investigation has established that portions of the criminally derived proceeds were used to acquire millions of dollars worth of assets including the defendant real properties set forth above. The investigation has further established that

many of the properties have been transferred to the following nominee corporations controlled by Rothstein, as set forth below, as a wealth preservation mechanism: "C1 07 LLC," "C1 08 LLC," "C1 16 LLC," "29 Bahia LLC," "MLC 350 LLC," "350 LOP #2840 LLC," "JB Boca M Holdings LLC."

17. The investigation has established that Rothstein's financial ability to acquire such properties did not exist prior to the execution of the "Ponzi" scheme.

18. ROTHSTEIN used proceeds obtained from the "Ponzi" scheme to acquire the defendant real properties.

19. ROTHSTEIN acquired Defendant 1 on or about September 21, 2007 for a sales price of \$1,750,000.

20. Defendant 1 was transferred, via Quit Claim Deed, to "C1 07 LLC" on or about August 10, 2009.

21. ROTHSTEIN acquired Defendant 2 on or about March 3, 2005 for a sales price of \$2,730,000.

22. Defendant 2 was transferred, via Quit Claim Deed, to "C1 08 LLC" on or about July 22, 2009.

23. ROTHSTEIN acquired Defendant 3 on or about March 14, 2007 for a sales price of \$1,925,000.

24. Defendant 3 was transferred, via Quit Claim Deed, to "C1 16 LLC" on or about August 10, 2009.

25. ROTHSTEIN and his wife Kimberly ROTHSTEIN acquired Defendant 4 on or about March 14, 2008 for a sales price of \$6,450,000.

26. Defendant 5, a vacant lot, was transferred to "29 Bahia LLC" on or about January 7,

2009, for a sales price of \$4,000,000.

27. Defendant 6 was acquired by "MLC350 LLC" on or about May 31, 2005.

28. Defendant 6 was transferred, via Warranty Deed, to "350 LOP #2840 LLC" on or about May 20, 2009.

29. ROTHSTEIN acquired Defendant 7 on or about April 8, 2008 for a sales price of \$475,000.

30. Defendant 7 was transferred to Debra E. Villegas on or about July 27, 2009 for \$100.

31. ROTHSTEIN acquired Defendant 8 on or about November 5, 2008 for a sales price of \$505,000.

32. Defendant 8 was transferred to "2133 IP LLC" on or about August 10, 2009 via quit claim deed for \$100.

FIRST CLAIM FOR FORFEITURE
18 U.S.C. §§ 981(a)(1)(C) and 1343

33. Plaintiff realleges paragraphs 5 through 32, above as if fully set forth herein.

34. Title 18, United States Code, Section 981(a)(1)(C) subjects to forfeiture: "[a]ny property, real or personal, which constitutes or is derived from proceeds traceable to ... any offense constituting 'specified unlawful activity' (as defined in Section 1956(c)(7) of this title, or a conspiracy to commit such offense."

35. "Specified unlawful activity" is defined in 18 U.S.C. §1956(c)(7), and the term includes any offense under 18 U.S.C. §1961(1). Section 1961(1) lists 18 U.S.C. 1343 (wire fraud) as an offense.

36. Title 18, United States Code, Section 1343 provides that:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits, or causes to be transmitted by means of wire, radio or television communication in interstate or foreign commerce, any writings, signs, signals, pictures or sounds for the purpose of executing such scheme or artifice, shall be fined...

37. "Ponzi" scheme investors utilized interstate wires to transfer their funds to ROTHSTEIN and or RRA.

38. The millions of dollars generated by the "Ponzi" scheme constitute proceeds of wire fraud.

39. ROTHSTEIN used the proceeds of wire fraud to acquire the defendant properties.

40. Based on the foregoing, the defendant properties constitute or were derived from proceeds traceable to the specified unlawful activity of wire fraud, in violation of Title 18, United States Code, Section 1343, and are thereby forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C).

SECOND CLAIM FOR FORFEITURE
18 U.S.C. §§ 981(a)(1)(A) and 1957

41. Plaintiff realleges paragraphs 5 through 32 above as if fully set forth herein.

42. Title 18, United States Code, Section 981(a)(1)(A) subjects to forfeiture "[a]ny property, real or personal, involved in a transaction or attempted transaction in violation of ... section 1957...of this title, or any property traceable to such property."

43. Title 18, United States Code, Section 1957 provides in pertinent part:

(a) Whoever, in any of the circumstances set forth in subsection (d), knowingly engages or attempts to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from specified unlawful activity, shall be punished as provided in subsection (b).

(d) The circumstances referred to in subsection (a) are –
(1) that the offense under this section takes place in the United States or in the special maritime and territorial jurisdiction of the United States...

44. “Monetary transaction” is defined in 18 U.S.C. §1957(f)(1) as the:

deposit, withdrawal, transfer, or exchange, in or affecting interstate or foreign commerce, of funds or a monetary instrument ... by, through, or to a financial institution (as defined in section 1956 of this title), including any transaction that would be a financial transaction under section 1956(c)(4)(B) of this title...

45. “Financial transaction” is defined in 18 U.S.C. §1956(c)(4) as:

(A) a transaction which in any way or degree affects interstate or foreign commerce (i) involving the movement of funds by wire or other means or (ii) involving one or more monetary instruments, or (iii) involving the transfer of title to any real property, vehicle, vessel or aircraft, or (B) a transaction involving the use of a financial institution which is engaged in, or the activities of which affect, interstate or foreign commerce in any way or degree.

46. “Criminally derived property” is defined in 18 U.S.C. §1957(f)(2) as “any property constituting, or derived from, proceeds obtained from a criminal offense.”

47. “Specified unlawful activity” is defined in 18 U.S.C. §1956(c)(7), and the term includes any offense under 18 U.S.C. §1961(1). Section 1961(1) lists 18 U.S.C. 1343 (wire fraud) as an offense.

48. Because the funds used to acquire the defendant properties, constitute criminally derived property from wire fraud, exceed \$10,000 and were involved in a monetary transaction, the defendants are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) as they represent properties involved in a transaction or attempted transaction in violation of 18 U.S.C. §1957, and properties traceable to such property.

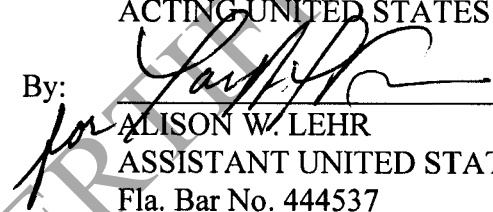
CONCLUSION

WHEREFORE, Plaintiff, United States of America requests, that any and all persons having any claim to the defendant properties be directed to file and serve their verified claims and answers as required by Rule G(5), of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, or suffer default thereof, and further requests that the Court declare the defendant properties condemned and forfeited to the United States of America, and that Plaintiff have such other and further relief as may be just and proper together with the costs and disbursements of this action.

Respectfully submitted,

JEFFREY H. SLOMAN
ACTING UNITED STATES ATTORNEY

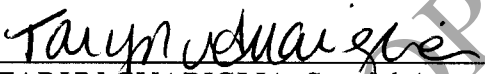
By:


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VERIFICATION

Pursuant to Title 28, United States Code, Section 1746, I declare under penalty of perjury, that I have read the foregoing Complaint for Forfeiture In Rem and state that the facts alleged therein are true and correct to the best of my knowledge and belief.

Executed this 9 day of November, 2009.


TARYN GUARIGLIA, Special Agent
INTERNAL REVENUE SERVICE

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APP. 16

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FBI doubts Rothstein ran a Ponzi scheme alone

By Sally Kestin and Peter Franceschina, Sun Sentinel

NOVEMBER 12, 2009

The FBI confirmed Thursday what many have speculated since the Scott Rothstein scandal broke: The flashy lawyer could not have defrauded investors of hundreds of millions without help.

"I do not believe that this was a one-man show," said John Gillies, head of the FBI in South Florida.

From his law firm, Rothstein ran a Ponzi scheme that sold bogus legal settlements to investors for four years, according to documents filed by federal prosecutors this week.

At least four people in the Rothstein Rosenfeldt Adler firm met with investors or handled money, investors told the *Sun Sentinel*.

The investors also identified two people from a finance company in the same building as the law firm. The two people attended meetings and represented themselves as Rothstein's agent and broker, investors said.

Rothstein sold investors structured legal settlements in sexual harassment and whistle-blower cases that guaranteed a minimum 20 percent return, according to records he gave investors. The plaintiff would receive a discounted lump-sum payment from the investors, who would then collect the full settlement from Rothstein over several months.

Prosecutors now say the settlements never existed, and Gillies said Thursday that the alleged fraud could exceed \$1 billion. No one, including Rothstein, has been charged.

Gillies declined to identify anyone as a Rothstein accomplice or say whether others could face criminal charges.

"As the investigation proceeds, I believe that's where the evidence will take us," he said.

Rothstein's partner, Stuart Rosenfeldt, has said he had "no clue" about the alleged fraud. The other partner, Russell Adler, is blameless and "totally without any liability," said his lawyer, Fred Haddad.

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Here's a look at some of those who participated in some way in Rothstein's investments, according to investors. It's not clear whether they knew about any fraud or were duped along with investors:

David Boden, general counsel of the law firm, sat in on Rothstein's meetings with investors and represented him in follow-up calls and negotiations.

Potential investor Alan Sakowitz, a Miami lawyer, met with Boden and Rothstein three times and said Boden tried to dispel his doubts in an August phone call.

"I asked him, 'Is this for real?' He said it was, that it's a legitimate deal, that everything was aboveboard," Sakowitz said.

Another group of investors met with Boden about the same time, and he gave them his law firm business card, said their attorney, Daniel Serber, of Aventura.

"David Boden was the contact person," Serber said. "He was the attorney who was in charge of negotiating the structured settlement documents."

After investors did not receive their scheduled payments from Rothstein the last week in October, Serber visited the law firm the Friday before Halloween. Rothstein already had left the country, and Boden met with Serber:

Boden told him that "it's business as usual" and that Rothstein had gone to London and "was working on getting some issues resolved so that the payments could be made."

Rothstein himself sent an e-mail later that afternoon, saying he was in London and would "instruct the wires to be sent out on Monday," Serber said.

Rothstein actually had flown to Morocco that Tuesday, and the payments never arrived.

Boden, 48, could not be reached despite several messages. He is cooperating with federal authorities, said his attorney, David Vinikoor:

"No one has advised us that he is" a target of the investigation, Vinikoor said. "I am viewing David Boden as a witness."

Records show Boden had been living in a \$1.9 million Las Olas Isles home owned by a Rothstein corporation in recent months. He registered an Audi A4 there in August and listed that address on his driver's license.

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Debra Villegas, the firm's chief operating officer, had an office in Rothstein's secured suite that was raided by federal agents last week, a day after Rothstein's return from Morocco.

Agents seized from Villegas' office corporate and personal bank records for Rothstein and his wife, property records, jewelry appraisals, car insurance policies and the itinerary for Rothstein's Moroccan trip on a chartered Gulfstream V.

Villegas' signature also appears on some of Rothstein's land transactions as a notary or witness.

Villegas, 42, worked her way up from paralegal to the chief executive of the 150-employee firm.

Federal prosecutors said Rothstein began running a Ponzi scheme in 2005. That year, Villegas earned \$80,000 a year, according to her divorce records. Two years later, her salary had increased to \$145,000.

In her 2007 divorce, Villegas reported receiving two high-end Swiss watches — a Rolex and a Breitling — from her "employer" and said Rothstein paid off her couch and a bedroom set and held title to her two Honda water scooters.

Villegas was living in a \$475,000 Weston home that Rothstein signed over to her in July for \$100 and "love and affection," according to the deed. Villegas registered a 2009 Maserati GranTurismo worth about \$100,000 at the home in January.

Federal prosecutors took action this week to seize the home, alleging it was among Rothstein's ill-gotten assets.

Villegas could not be reached despite several messages. Her attorney, Paul Lazarus, declined to comment on whether she had a role in Rothstein's investment business.

"It's a matter the feds have under investigation," Lazarus said. "I have no comment."

Irene Stay, the law firm's chief financial officer, handled wire transfers involving the investment accounts.

When Serber visited the firm Oct. 30 to demand the overdue payments to the investors he represented, Boden produced e-mail messages from "the person who was in charge of the wire transfers, Irene Stay," Serber said.

Federal agents last week seized documents from Stay's office, including investment deposit logs and

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pulls from Rothstein to Irene to move money.
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Stay, 45, could not be reached despite messages left at her office and home in Miami.

Richard Pearson, 52, president of a company that has offices in the same building as the law firm, told investors he was brokering the settlements for Rothstein.

"My clients were told that he was a broker and had the exclusive right to sell these investments," Serber said.

For one meeting, Serber's investors met Boden and Pearson in the law firm lobby and then went to Pearson's office at R.L. Pearson and Associates Inc., Serber said. A business card for Pearson's company says it is involved in commercial real estate, gaming and finance.

Sakowitz, the potential investor, said Pearson, representing himself as Rothstein's agent, wanted 20 percent of the profits from any investment his group made. He said Pearson sat in on his meetings with Rothstein.

Sakowitz said he learned of the investment opportunity from Nabil Rhazi, an associate in Pearson's company.

"Nabil was the one who reached out to my broker," he said.

Reached on his cell phone, Rhazi said he could not talk because he was at dinner and then did not respond to subsequent messages.

Martin Steinberg, an attorney for Pearson, said it was "too preliminary to tell anything."

"I never heard that before that Mr. Pearson was an exclusive agent for anybody," Steinberg said.

Frank Spinoso, a regional vice president at TD Bank, handled Rothstein's investment accounts and met with investors.

"TD Bank's internal bank records verified the amounts of money in the accounts and certified that they were held in trust for the benefit of investors," said William Scherer, an attorney representing investors who lost about \$98 million.

Letters with Spinoso's signature certified the account balances and helped reassure investors that their money was safe, Scherer said.

"It would never have happened but for the bank," Scherer said.

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Spinosa, 48, is on leave from the bank, pending an internal investigation. His attorney, Sam Rabin, described him as a "good and honorable man" who did nothing illegal.

"He was unaware of Mr. Rothstein's scam," Rabin said. "Rothstein or someone involved with him fabricated documents attributed to Mr. Spinosa."

Federal prosecutors said in court documents this week that Rothstein and co-conspirators showed investors documents with fabricated bank account balances "as a fraudulent inducement" to put up money.

Staff Writers Jon Burstein, Paula McMahon and Brittany Wallman contributed to this report.

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